

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware
corporation; AMAZON.COM SERVICES LLC,
a Delaware limited liability company; and
NINTENDO OF AMERICA INC., a
Washington corporation,

Plaintiffs,

v.

CHEN JING, and individual; ZHOU RONG, an
individual; JINGJING SHAO, an individual,

Defendants.

No. 2:23-cv-01641-MJP

**DECLARATION OF ROBERT
GARRETT IN SUPPORT OF
PLAINTIFFS' *EX PARTE* MOTION
FOR DEFAULT JUDGMENT AND
PERMANENT INJUNCTION AGAINST
DEFENDANTS CHEN JING AND
ZHOU RONG**

I, Robert Garrett, declare as follows:

1. I am over the age of 18 and am competent to testify to the matters stated herein. I have been employed by Amazon.com, Inc. or its affiliates and subsidiaries ("Amazon"), since June 24, 2019. I have personal knowledge of the facts in this declaration or have acquired this knowledge through my review of records kept in the regular course of business. The statements made below are true to the best of my knowledge and belief. I make them in support of Amazon's and Nintendo of America, Inc.'s ("Nintendo") Motion for Default Judgment and Permanent Injunction against Defendants Chen Jing and Zhou Rong.

2. My current role is Principal Risk Manager for the Amazon Counterfeit Crimes Unit, where I am responsible for investigating bad actors suspected of selling counterfeit

1 products in Amazon's stores. The Amazon Counterfeit Crimes Unit is a global team dedicated to
 2 pursuing bad actors such as Defendants and holding them accountable to the fullest extent of the
 3 law, including by working with law enforcement and pursuing civil lawsuits.

4 3. As part of Amazon's investigation into the sale of counterfeit Nintendo-branded
 5 products, I collected, reviewed, and analyzed information associated with the following selling
 6 accounts: (1) AmliboCards; (2) Blkei; (3) Chengdahuo; (4) Chiaofushi; (5) Fyhale Direct;
 7 (6) Jiadan-US; (7) Marsberg; (8) Srhdfbeygfjs; and (9) Xingfang (collectively, the "Selling
 8 Accounts"). Amazon's sales records indicate that the Selling Accounts collectively sold at least
 9 \$2,343,386 in counterfeit Nintendo-branded products. More specifically, the Selling Accounts'
 10 respective sales of counterfeit Nintendo-branded products are as follows: (1) Blkei: \$235,321;
 11 (2) Chengdahuo: \$15,884; (3) AmliboCards: \$990,917; (4) Chiaofushi: \$180,853; (5) Fyhale
 12 Direct: \$78,395; (6) Jiadan-US: \$237,348; (7) Marsberg: \$116,679; (8) Srhdfbeygfjs: \$346,029;
 13 and (9) Xingfang: \$141,960. These sales occurred between August 4, 2019 and May 24, 2023. In
 14 addition, all but the AmliboCards Selling Account sold counterfeit Nintendo-branded products to
 15 customers in Washington state.

16
 17 I declare under penalty of perjury under the laws of the United States that the foregoing
 18 is true and correct.

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 20 EXECUTED this 11th day of February, 2025 at Fairfax, Virginia.

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 23 ROBERT GARRETT
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